RECEIVED & INSPECTED

FEB 6 2006

FCC - MAILROOM

DOCKET FILE COPY ORIGINAL

February 4, 2006

Ms. Marlene Dortch Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: Counterproposal

Millerton, Oklahoma (MB Docket No. 05-328)

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of my counterproposal for Millerton, Oklahoma. (MB Docket No. 05-328)

Respectfully submitted,

Katherine Pyeatt

3500 Maple Ave., #1320

Dallas, Texas 75219

(214) 991-9363

Mil Cov

No. of Copies reo'd 0+4. List ABODE

RECEIVED & INSPECTED

FEB **6** 2006

FCC - MAILROOM

Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)	
)	
Amendment of 73.202(b))	MB Docket No.05-328
Table of Allotments)	RM-10577
FM Broadcast Stations)	
(Millerton, OK))	

To:

Office of the Secretary

Attn:

Assistant Chief, Audio Division,

Media Bureau

COUNTERPROPOSAL

Katherine Pyeatt hereby submits this counterproposal to the Notice of Proposed Rule Making, DA 05-3213 (rel. December 16, 2005) in the above-captioned proceeding.

Counter proponent proposes to allot a first service and a second competing service in lieu of only a first service to Millerton, Texas as proposed by the original NPRM in this proceeding.

DISCUSSION

The original petition proposed to allot Channel 265A to Millerton, Oklahoma as a first local service. I am proposing to allot Channel 265C3 to Millerton, Oklahoma and Channel 262A to Broken Bow, Oklahoma. In order to accomplish this, the vacant allotment for Channel 263A at Annona, Texas will need to move approximately 4.42 km south.

The proposed changes are:

	<u>Currenc</u>	Proposed
Millerton, Oklahoma		265C3
Broken Bow, Oklahoma		262A
Annona, Texas	263A	263A

Counter proponent respectfully submits that the public interest would be served by allocating channel 265C3 to Millerton, Oklahoma as that community's first local service and channel 262A to Broken Bow, Oklahoma as that community's second competing service.

Millerton, Oklahoma 265C3/ 1st service

Millerton, Oklahoma is an incorporated community with a population of 359 people.² Millerton has its own post office, volunteer fire department, mayor and a number of local churches.

Attached hereto is a channel study confirming that Channel 265C3 can be allocated to Millerton, Oklahoma, consistent with the FCC's FM separation rules. See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). (See, Attachment A)

Reference coordinates for Channel 265C3 at Millerton, Oklahoma are:

34 09 30 N 95 05 00 W

 $^{^{\}rm 1}$ Broken Bow, Oklahoma is currently served by KKBI 291C2 and the vacant allotment channel 285A is currently designated for Broken Bow. $^{\rm 2}$ 2000 US Census

Broken Bow, Oklahoma 262A/ 2nd competing service

Broken Bow, Oklahoma is an incorporated community with a population 4,230. Broken Bow has its own post office, police department, fire department, mayor and a number of local churches.

Attached hereto is a channel study confirming that channel 262A can be allocated to Broken Bow, Oklahoma consistent with the FCC's FM separation rules provided the change is made at Annona, Texas. See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). (See, Attachment B)

Reference coordinates for channel 262A at Broken Bow, Oklahoma are:

34 05 30 N 94 38 00 W

In order for channel 262A to be allotted at Broken Bow, the vacant allotment for channel 263A at Annona, Texas must be relocated approximately 4.42 km south.

Attached hereto is a channel study confirming that the vacant allotment for channel 263A at Annona, Texas can be move approximately 4.42 km south consistent with the FCC's FM separation rules. See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). (See, Attachment C)

^{3 2000} US Census

The new reference coordinates for channel 263A at Annona,
Texas are:

33 32 30 N 95 03 36 W

Should this counterproposal be granted and channel 265C3 is allotted to Millerton, Oklahoma and channel 262A is allotted to Broken Bow, Oklahoma, Counterproponent will apply for these channels and after they are authorized, will promptly construct the new facilities.

The factual information provided in this counterproposal is correct and true to the best of my knowledge.

Respectfully submitted,

Katherine Pyeatt

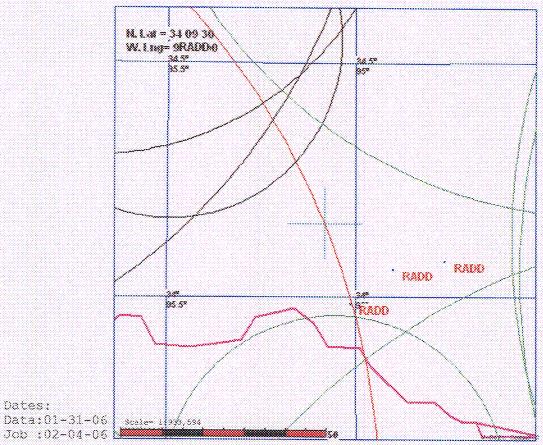
3500 Maple Ave., #1320

Dallas, Texas 75219

(214) 991-9363

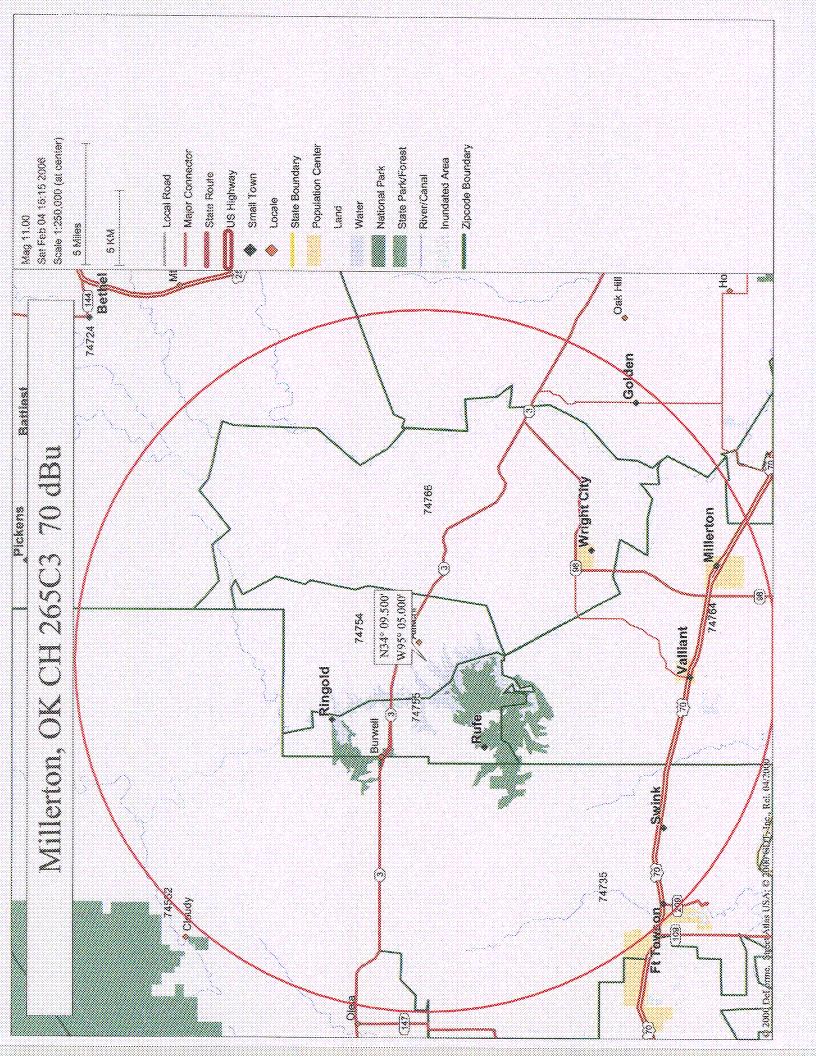
February 4, 2006

Attachment A (Channel Study for Channel 265C3 at Millerton, Oklahoma)

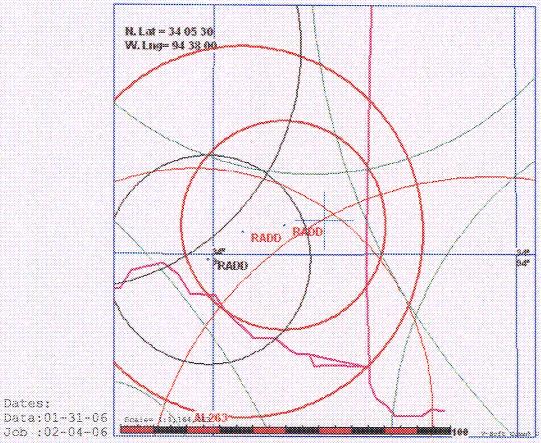


Dates:

RADD 265C2 ADD Millerton OK 20.02 123.0 177.0 -156.9 RADD 265A ADD Millerton OK 20.19 161.4 142.0 -121.8 RADD 265A ADD Broken Bow OK 30.71 106.8 142.0 -111.2 KWRDFM 264C LIC N Highland Village TX 175.93 247.3 176.0 -0.0 RADD 263A ADD Clatyon OK 57.42 318.8 42.0 15.4	.n
RADD 265A ADD Broken Bow OK 30.71 106.8 142.0 -111.2 KWRDFM 264C LIC N Highland Village TX 175.93 247.3 176.0 -0.0	- 18
KWRDFM 264C LIC N Highland Village TX 175.93 247.3 176.0 -0.0	1
	9
RADD 263A ADD Clatvon OK 57.42 318.8 42.0 15.4	17
	2
KLSZFM 264C2 LIC Fort Smith AR 136.52 29.5 117.0 19.5	,2
AL263 263A VAC Annona TX 64.04 177.7 42.0 22.0	্র
RADD 265A ADD Holdenville OK 166.62 308.5 142.0 24.6	2
KMCO 267C1 LIC Mcalester OK 108.07 328.6 76.0 32.0	7
RDEL 267C1 DEL Mcalester OK 108.07 328.6 76.0 32.0	7
FADD 267C1 ADD Wilburton OK 108.07 328.6 76.0 32.0	7
KRMDFM 266C0 LIC Oil City LA 195.24 146.6 163.0 32.2	4
KDELFM 265A LIC Arkadelphia AR 187.60 91.0 142.0 45.6	0
KDELFC 265C3 CP Arkadelphia AR 200.84 93.4 153.0 47.8	4
WER .C 266C CP Dallas TX 247.12 225.6 176.0 71.1	2
WRR 266C LIC Dallas TX 247.15 225.6 176.0 71.1	5
KWKK 265A LIC N Russellville AR 215.25 53.5 142.0 73.2	5

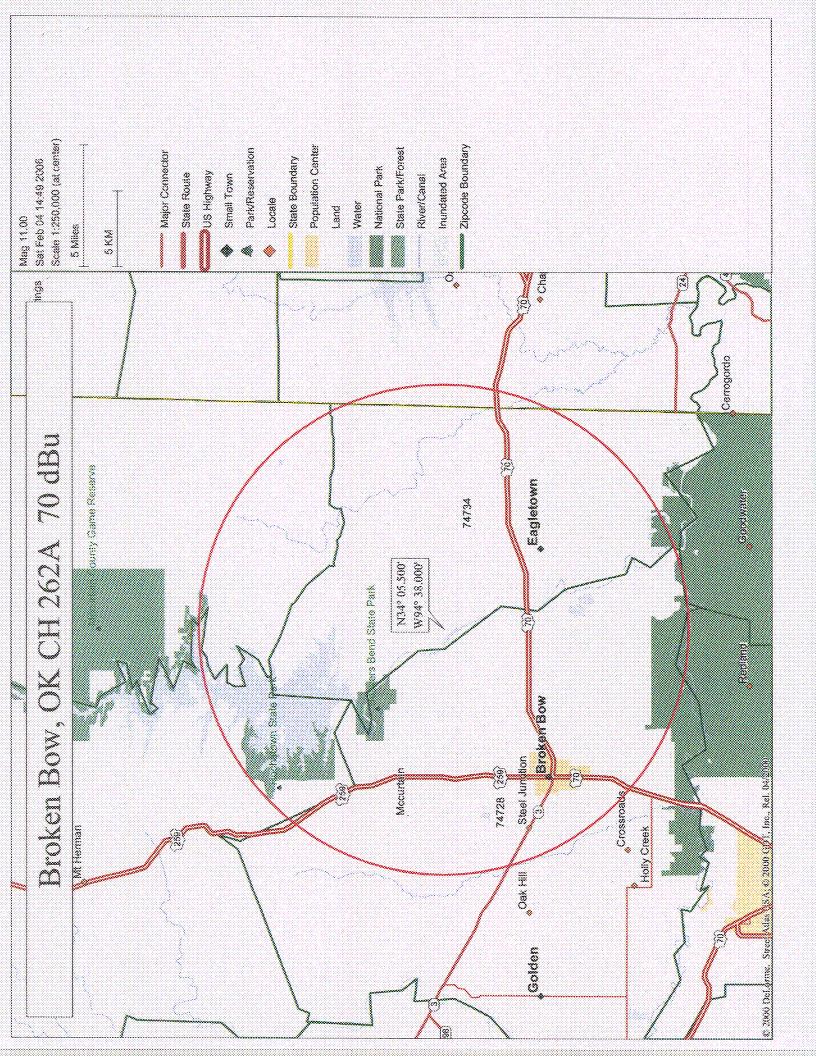


Attachment B (Channel Study for Channel 262A at Broken Bow, Oklahoma)

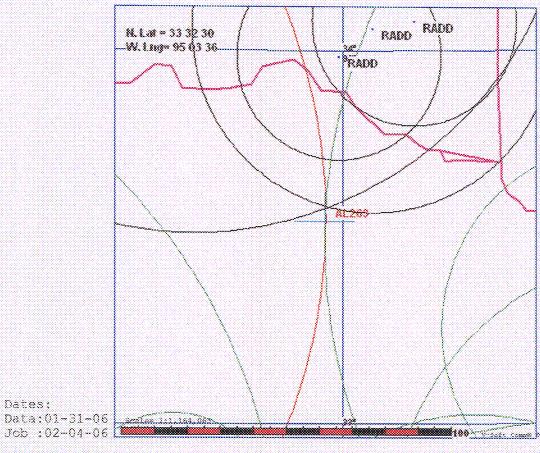


Dates:

Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
RADD	265C2	ADD	Millerton	OK	24.96	262.0	55.0	-30.04
RADD	265A	ADD	Broken Bow	OK	12.22	262.9	31.0	-18.78
AL263	263A	VAC	Annona	TΧ	68.76	214.6	72.0	-3.24
KNRB	261C2	LIC	Atlanta	TX	105.69	151.4	106.0	-0.31
RADD	265A	ADD	Millerton	OK	37.00	251.5	31.0	6.00
KDJE	26201	LIC	Jacksonville	AR	211.77	67.6	200.0	11.77
KTCSFM	260C	LIC	Fort Smith	AR	108.85	357.7	95.0	13.85
RADD	263A	ADD	Clatyon	OK	94.09	302.8	72.0	22.09
KZHE	263C2	LIC	Stamps	AR	143.29	118.2	106.0	37.29
KJKK	262C	LIC	Dallas	TX	273.79	232.9	226.0	47.79
KLSZFM	264C2	LIC	Fort Smith	AR	128.59	11.9	55.0	73.59
AU062	259A	VAC	Sulphur Bluff	TX	104.80	221.6	31.0	73.80

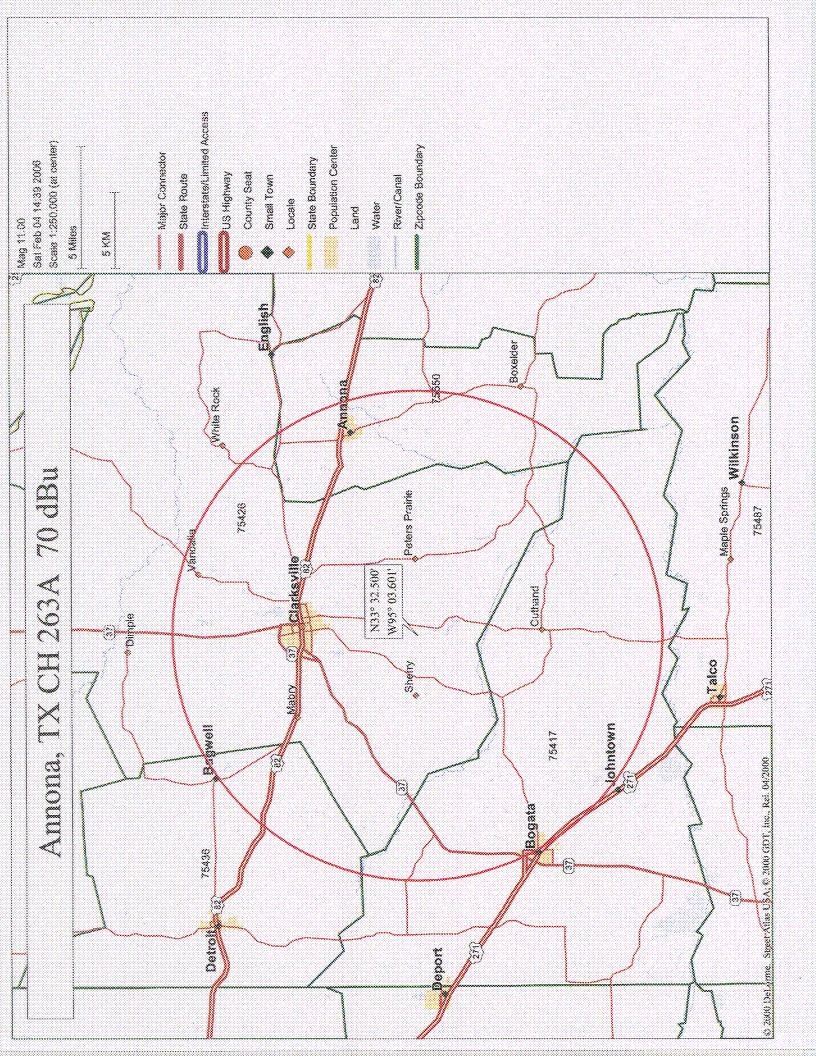


Attachment C (Channel Study for the relocation of the Vacant Allotment, channel 263A at Annona, Texas)



3	×	1		-	Ċ.	ij	3													
		200								96			9			8		24		
3		Э.		٠.	2	1	Ċ.	1			`	ì,	Ċ			è	o	Ġ.	'n	5
	ò	10	***	2	S	8	Ų,		ž.		ð	ì	Ľ	۲	7	3		ť.	С	٤

Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
AL263	263A	VAC	Annona	TX	4.42	5.7	115.0	-110.58
KWRDFM	264C	LIC N	Highland Village	TX	164.55	270.3	165.0	-0.45
KZHE	263C2	LIC	Stamps	AR	166.19	92.0	166.0	0.19
RADD	263A	ADD	Clatyon	OK	118.52	340.3	115.0	3.52
RADD	265C2	ADD	Millerton	OK	59.37	14.2	55.0	4.37
RADD	265A	ADD	Millerton	OK	49.45	5.0	31.0	18.45
RADD	265A	ADD	Broken Bow	OK	65.47	24.5	31.0	34.47
KNRB	261C2	LIC	Atlanta	TX	95.87	109.2	55.0	40.87
KJKK	262C	DIC	Dallas	TX	206.97	239.6	165.0	41.97
KRMDFM	266C0	LIC	Oil City	LA	141.67	131.9	86.0	55.67
KXALFM	262A	LIC	Tatum	TX	137.00	160.5	72.0	65.00
KPXI	264C3	LIC-Z	Overton	ТX	154.11	179.9	89.0	65.11
KMOOFM	260A	LIC	Mineola	ΥX	99.09	207.8	31.0	68.09
KQBB.C	26303	CP -Z	Center	TX	214.95	159.4	142.0	72.95



CERTIFICATE OF SERVICE

I, Katherine Pyeatt, hereby certify that on this 4th day of February, 2006, I caused copies of the foregoing "Counterproposal" to be placed in the U.S. Postal Service, first class postage prepaid, addressed to the following persons:

Jeraldine Anderson 1702 Cypress Drive Irving, Texas 75061

Katherine Pyeatt